

---

ARNOLD & PORTER LLP

---

Kent A. Yalowitz

Kent.Yalowitz@aporter.com  
+1 212.715.1113  
+1 212.715.1399 Fax  
399 Park Avenue  
New York, NY 10022-4690

January 11, 2015

**VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*  
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write in response to defendants' letter of January 10, 2015, objecting to plaintiffs' opening exhibits and demonstratives. An opening statement is for describing the evidence as counsel expects it to come in. It is not the time to test the factual assertions of the parties, and it is certainly not appropriate for one lawyer to try to micro-manage the other side's demonstrative aides.

However, one of Mr. Rochon's assertions in his letter is such a serious misrepresentation of fact to the Court that it must be corrected immediately.

Mr. Rochon contends that Exhibit 201 is not a PA publication. He is flat wrong.

Exhibit 201 is an excerpt from a publication called *al Shuhada* ("the Martyrs"). The masthead states plainly that *al Shuhada* is a "Monthly Bulletin Published by Political Guidance for the Border-Region Forces." It lists as its "Editor in Chief" an individual named Ahmad Ibrahim Hilles and states his title as "Political Commissioner for the Border-Region Forces."

This is the PA's own publication. To demonstrate this fact, I enclose a one-page translation of a page from the website of WAFA—defendants' own official news agency. The page shows that the defendants' "Official Media" includes the "Political and Moral Guidance Commission." It states that the Commission was established "in order to serve as a national source of authority, acting within the National Security [Service], the police

---

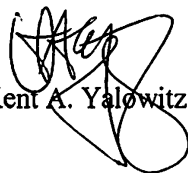
ARNOLD & PORTER LLP

---

Hon. George B. Daniels  
January 11, 2015  
Page 2

and other security services.” The webpage also states that the Commission has  
“published a number of periodicals.”

Respectfully,

  
Kent A. Yalowitz

cc: All ECF Counsel  
Encl.